# EXHIBIT B

#### BINGHAM McCUTCHEN

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August 24, 2005

Clerk of the Panel
Judicial Panel on Multidistrict Litigation
Thurgood Marshall Federal Judiciary Building
One Columbus Circle, N.E.
Room G-255, North Lobby
Washington, D.C. 20002-8004

Re: In Re Microprocessor Antitrust Litigation, MDL-1717

Suite 800 1120 20th Street, NW Washington, DC 20036-3406

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Washington

Dear Clerk of the Panel:

Pursuant to Rules 7.2(i) and 7.5(e) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, I am writing to inform the Panel of a potential tag-along action, Cory Wiles, individually and on behalf of himself and all persons similarly situated, Plaintiff, vs. Intel Corporation, a Delaware Corporation, Defendant, Civil Action No. 05-2605, pending in the Western District of Tennessee before the Honorable J. Daniel Breen.

Enclosed please find the timely notice of removal filed on August 18, 2005; the Amended Complaint filed on August 18, 2005; and the original Complaint filed on July 20, 2005, in the Thirtieth Judicial District Court of the State of Tennessee in and for Shelby County as Civil Case No. CT 3801-05 (Div. IV).

Defendant Intel respectfully requests this action should be consolidated with the other related proceedings. The MDL petition in the above captioned matter has been set for hearing by the Panel on September 29, 2005, in Asheville, North Carolina.

Sincerely,

## original signed

Richard A. Ripley

**Enclosures** 

cc: Honorable J. Daniel Breen, Western District of Tennessee
William M. Audet
B.J. Wade
attached Service List

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# BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

In re Microprocessor Antitrust Litigation

MDL Docket No. 1717

### NOTICE OF RELATED, TAG-ALONG ACTION

Pursuant to Rules 7.2(i) and 7.5(e) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, Defendant Intel Corporation ("Intel") hereby notifies the Clerk of the Panel of the following tag-along action and state as follows:

There is an additional tag-along case now pending in the Western District of Tennessee, Cory Wiles, individually and on behalf of himself and all persons similarly situated, Plaintiff, vs. Intel Corporation, a Delaware Corporation, Defendant, No. 05-2605, before the Honorable J. Daniel Breen. It was filed on July 20, 2005, in the Thirtieth Judicial District Court of the State of Tennessee in

and for Shelby County as Civil Case No. CT 3801-05 (Div. IV) and properly removed on August 18, 2005.

- Attached please find the timely notice of removal, (Exhibit A), the amended complaint filed in state court (Exhibit B), and the original complaint (Exhibit C).
- This related case is tag-along action because it involved "common questions of fact" with actions previously presented to the JPML. See JPML Rule 1.1, 7.5(d).

Defendant Intel respectfully requests this action be consolidated with the other noticed actions in the above captioned MDL, still under consideration by this Panel and set for a hearing on September 29, 2005.

DATED: August 24, 2005

Richard A. Ripley

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Attorneys for Defendant
INTEL CORPORATION for all putative class
actions